

#3545
&

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

June 14, 2010

TO: Internal File

THRU: Priscilla Burton, Team Lead *pwb m 805*

FROM: James D. Smith, Environmental Scientist III *JS June '10*

RE: Rail Loadout Asphalt and Concrete, Canyon Fuel Company, LLC, Skyline Mine,
Permit # C/007/0005, Task ID #3545

SUMMARY:

The Permittee submitted this amendment to the Division on May 11, 2010 (Task ID #3544), then withdrew that application on May 19, 2010 and resubmitted with revised information on that same day (Task ID #3545). This plan modification involves paving the entry end of the Truck Driveway at the railroad Loadout Building with asphalt and replacing asphalt with concrete at the Truck Driveway exit. The Permittee will also pave a small section of the road shoulder on the west side of State Road (SR) 96, opposite the Truck Driveway exit. These modifications are to reduce fugitive dust from trucks entering and leaving the Loadout Building.

The Permittee has revised the Exempt Area descriptions on pp. 3-69 and 3-71, Drawing 3.2.1-3, and the demolition costs to include the additional asphalt and concrete. The application contains both redline / strikeout pages that show the revisions and clean copies ready for incorporation into the MRP.

The Division recommends approval of this amendment, conditional on the Permittee making three minor corrections – unrelated to this amendment – to Drawing 3.2.1-3.

TECHNICAL MEMO

TECHNICAL ANALYSIS:

OPERATION PLAN

RELOCATION OR USE OF PUBLIC ROADS

Regulatory Reference: 30 CFR 784.18; R645-301-521, -301-526.

Analysis:

The current MRP includes on page 3-70 a copy of a letter from UDOT that affirms the right of the Permittee to use approaches to ingress and egress the state highway system, including SR 96

Findings:

Information on Relocation or Use of Public Roads is sufficient to meet the requirements of the Coal Mining Rules.

HYDROLOGIC INFORMATION

Regulatory Reference: 30 CFR Sec. 773.17, 774.13, 784.14, 784.16, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-300-140, -300-141, -300-142, -300-143, -300-144, -300-145, -300-146, -300-147, -300-147, -300-148, -301-512, -301-514, -301-521, -301-531, -301-532, -301-533, -301-536, -301-542, -301-720, -301-731, -301-732, -301-733, -301-742, -301-743, -301-750, -301-761, -301-764.

Analysis:

Sediment Control Measures

According to the MRP, Area 19, located on the south side of the Railroad Loadout Building, is currently covered with approximately 4 inches of 2-inch rock; however, Drawing 3.2.1-3 shows it as paved. Nevertheless, the submitted modification calls for this area to be paved with asphalt. Area 18, the exit driveway on the north side of the Loadout Building will be paved with concrete. A new area on the west shoulder of State Highway 96, across the highway from the exit from the Railroad Loadout Building, is to be paved with asphalt: this will be Area 22a.

Area 20 is discussed in Section 3.2 of the MRP along with Areas 21, 22, and 22a. Area 20 is not labeled on Drawing 3.2.1-3, but it is the exempt area on the west side of SR 96, opposite from the Loadout Building and under the BC-13 Conveyor. Areas 21 and 22 are the paved approaches from SR 96 to Areas 19 and 18, respectively.

Siltation Structures: Exemptions

Areas 18, 19, 20, 21, 22, and 22a are Exempt areas because they are paved, preventing erosion and additional contributions of suspended solids to streamflow or runoff outside the disturbed area. Silt fence along the east side of SR 96 provides additional sediment control; the Permittee needs to indicate this silt fence on Drawing 3.2.1-3.

Findings:

Hydrologic Information provided in this amendment meets the requirements of the Coal Mining Rules.

MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323.

Analysis:

Mining Facilities Maps

The Permittee has modified Drawing 3.2.1-3 to show that Area 19, the Paved Truck Driveway located on the south side of the railroad Loadout Building will be paved with asphalt, and Area 18, the exit driveway on the north side of the Loadout Building, will be paved with concrete. It also shows the new Area 22a on the west shoulder of State Highway 96, across the highway from the exit from the railroad Loadout Building that is to be paved.

Area 20 is discussed in Section 3.2 of the MRP along with Areas 21, 22, and 22a, but Area 20 is not identified on Drawing 3.2.1-3; the Permittee needs to indicate Area 20 on Drawing 3.2.1-3. This drawing contains a note referring to page 2-26a of the MRP; page 2-26a is no longer in the MRP and the Permittee needs to remove this note. The Permittee also needs to show on Drawing 3.2.1-3 the location of the silt fence along the east side of the SR 96 right-of-way, adjacent to the railroad Loadout Building.

Certification Requirements

Carl W. Winters, a PE, certified Drawing 3.2.1-3.

TECHNICAL MEMO

Findings:

Maps, Plans, and Cross Sections of Mining Operations are adequate to meet the requirements of the Coal Mining Rules for this amendment. The Division has found three minor corrections, unrelated to this amendment, that are needed on Drawing 3.2.1-3; the Permittee should include these on the drawing submitted with the final clean copies.

RECLAMATION PLAN

HYDROLOGIC INFORMATION

Regulatory Reference: 30 CFR Sec. 784.14, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-301-512, -301-513, -301-514, -301-515, -301-532, -301-533, -301-542, -301-723, -301-724, -301-725, -301-726, -301-728, -301-729, -301-731, -301-733, -301-742, -301-743, -301-750, -301-751, -301-760, -301-761.

Analysis:

Hydrologic Reclamation Plan

The Hydrologic Reclamation Plan is not affected by this amendment; the Hydrologic Reclamation Plan remains adequate to meet the requirements of the Utah Coal Mining Rules. The Permittee has modified the estimated reclamation costs to include removal of the additional concrete and asphalt.

Findings:

Hydrologic Reclamation plan information is adequate to meet the requirements of the Utah Coal Mining Rules.

RECOMMENDATIONS:

The Division should approve this amendment, conditional on the Permittee providing final, clean copies of Drawing 3.2.1-3 with the three corrections noted above.